REMARKS

Claims 1, 3-6, 8-16, 18-23, 24-29 are pending in the application. Claims 1, 11, 16 and 23 are independent claims. Claims 1, 3-6, 8-16, 18-23, 24-29 stand rejected.

Claim Rejections - 35 USC § 103

Claims 1, 3, 16, and 23 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Fitzsimons (US 2004/0205452), in view of Burnett (US 2004/0085999 A1).

Regarding **claim 1**, applicants respectfully submit that claim 1 is patentably defined over the cited art for at least the reasons that (1) neither the cited portions of Fitzsimons nor the cited portions of Burnett teach passing sets of pointers to a buffer to apply transforms to columns of data as is claimed, and (2) the examiner has not provided reasoning with some rational underpinning sufficient to support the legal conclusion of obviousness.

First, applicants submit that neither the cited portions of Fitzsimons nor the cited portions of Burnett teach passing sets of pointers to a buffer to apply transforms to columns of data as is claimed. The examiner cites to Fitzsimons paragraph [0070] as teaching "passing the first set of pointers to the data in the buffer to a first component in order for the first component to apply a first transform to the at least one column in the plurality of rows directly in the buffer" of claim 1. Paragraph [0070] of Fitzsimons states:

> The preferred node controller configuration will depend on the context of system deployment. Factors such as, but not limited to, the capacity and/or location of the underlying hardware resources may affect deployment requirements and configuration. Regardless of if the configuration results in more consolidated and/or integrated program modules, results in a more distributed series of program modules, and/or results in some combination between a consolidated and/or distributed configuration, communication of data may be communicated, obtained, and/or provided. Instances of modules (from the module collection) consolidated into a common code base from the program module collection may communicate, obtain, and/or provide data. All program module instances and controllers working in concert may do so through standard data processing communication techniques. This may be accomplished through standard data processing techniques such as, but not limited to: data referencing (e.g., pointers), internal messaging, object instance variable communication, shared memory space, variable passing, and/or the like (intra-application communication).

Applicants are unable to discern how this paragraph teaches passing sets of pointers to a buffer to apply transforms to columns of data. Accordingly, applicants submit that the cited portions of Fitzsimons simply do not teach passing sets of pointers to a buffer to apply transforms to columns of data as is claimed.

The examiner further cites to Burnett paragraph [0047] as teaching "passing the first set of pointers to the data in the buffer to a second component in order for the second component to apply a second transform to the at least one column in the plurality of rows directly in the buffer," as recited by claim 1. Burnett's paragraph [0047] states:

> With specific reference to FIG. 9 of the drawings, there is shown a flow chart of the ***buffer write process*** 650 performed by the buffer manager 403. ***The protocol engine 402 initiates the write process*** for each byte destined for storage in the SDRAM 335 or 337. The protocol engine 402 passes an 8-bit data byte, a 13-bit CAM index 613, and a 2-bit command flag 902. The CAM index 613 that is passed to the buffer manager 403 includes an extra bit. That extra bit is a pure cell indication and if it is true, the buffer manager 403 processes the byte passed to the buffer manager 403 in the same way as other bytes stored to the SDRAM, but it is stored in a message block in the SDRAM dedicated to the pure cell special case. The buffer manager 403 maintains the message table in the SDRAM 335 or 337. The message table maps CAM indexes 613 to ***an address pointer that indicates the location in SDRAM memory that is to receive the next byte***. The CAM index having the pure cell bit set to an affirmative value has a dedicated message block in SDRAM 335 or 337. ***When the buffer write process is initiated***, the first step is to evaluate 903 the command flag 902. The command flag 902 indicates one of three possible states; start, continue and end. If the command flag 902 reflects a "start" value 904, the buffer manager 403 creates 905 a new entry in the message table by identifying an unused message block and writing the CAM index 613 to the message table with the appropriate address pointer. If the command flag reflects a "continue" or "end" value 906, it means that reassembly of the current message is in progress and the CAM index 613 is already part of the message table. Accordingly, after creation of the new message table entry 907 or when the command flag reflects a value other than "start", the buffer manager 403 proceeds to look up 908 the CAM index 613 in the message table. The look up process returns the address pointer 909 and the buffer manager 403 stores 910 the data byte 901 at the SDRAM location designated by the address pointer 909. The process then increments 911 the address pointer 909 and updates the message table with the new address pointer value. The buffer manager 403 then evaluates 912 the command flag 902. If the command flag reflects an "end" value 913, then the data byte is the last byte for the current message. Accordingly, the buffer manager 403 stores 914 a start address pointer for the current message into a completed message list in the SDRAM 335 or 337 as well as the number of bytes stored in the message. After updating the completed message list or if the command flag 902 does not reflect an "end" value, the process then proceeds to an end. ***The buffer write process 650 executes for each byte stored in the SDRAM 335 or 337.***

(Emphasis added.) Applicants respectfully submit that this paragraph of Burnett is directed to writing data to a buffer. In contrast, claim 1 recites "apply[ing] a second transform to the at least one column in the plurality of rows *directly in the buffer*." (Emphasis added.) Because the cited portion of Burnett are directed to writing data to a buffer, and not transforming data already in a buffer, applicants submit that the cited portions of Burnett simply do not teach passing sets of pointers to a buffer to apply transforms to columns of data as is claimed.

Second, applicants submit that the examiner has not provided reasoning with some rational underpinning sufficient to support the legal conclusion of obviousness, and thus has not made a *prima facie* case of obviousness. Regarding this point, the examiner is reminded of the standard for reasoning which will support an obviousness rejection, as found in MPEP § 2141:

> The key to supporting any rejection under 35 U.S.C. 103 is ***the clear articulation of the reason(s) why the claimed invention would have been obvious***. The Supreme Court in KSR noted that the analysis supporting a rejection under 35 U.S.C. 103 should be made explicit. The Court quoting In re Kahn, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006), stated that "'[R]ejections on obviousness cannot be sustained by mere conclusory statements; instead, ***there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness***.'" KSR, 550 U.S. at ___, 82 USPQ2d at 1396.

(Emphasis added.) In the Official Action, the examiner's stated reason for combing Burnett with Fitzsimons was "in order to reduce the occurrence of rivers in the text of the printed document." (Official Action, page 4.) Applicants respectfully submit that the subject matter of claim 1 has nothing to do with rivers or printed documents. Accordingly, applicants submit that the examiner has not provided sufficient reasoning with some rational underpinning to support the legal conclusion of obviousness.

For at least the foregoing two reasons, applicants submit that claim 1 is patentably defined over the cited art and request withdrawal of the rejection of claim 1.

Independent **claims 16 and 23** were rejected for essentially the same reasons as claim 1. For at least the reasons discussed above regarding claim 1, applicants submit that claims 16 and 23 are patentably defined over the cited art and request withdrawal of the rejection of claims 16 and 23.

Inasmuch as **claims 2, 3, 17, and 24** depend from independent claims 1, 16 and 23, applicants submit that claims 2, 3, 17, and 24 are patentably defined over the cited art and request withdrawal of the rejection of claims 2, 3, 17, and 24.

Claims 4-6, 8-10, and 18-22 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Fitzsimons (US 2004/0205452), in view of Burnett (US 2004/0085999 A1) further in view of Carosso et al (US 4,783,760).

Regarding **claims 4-6, 8-10, and 18-22**, applicants submit that they depend from and incorporate all of the limitations of their respective independent base claims. As such, applicant submit that the analysis above applies with respect to the independent claims 1 and 16. In addition, the addition of Carosso does not cure the deficiency of Fitzsimons. Carosso is generally directed to word processing and not transforming columns in rows of data as claimed. Accordingly, Applicant respectfully submits that claims 4-6, 8-10, and 18-22 also patentably define over Fitzsimons in view of Carosso.

Claims 11-15, and 25-29 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Fitzsimons (US 2004/0205452), in view of Carosso et al (US 4,783,760).

Regarding **claim 11**, applicants submit that claim 11 is patentably defined over the cited art for at least the reason that neither the cited portions of Fitzsimons nor the cited portions of Carosso teach or suggest "passing the plurality of pointers to a plurality of transformation objects in a path, wherein each transformation object applies a transformation to the data in series," as recited by claim 11. The examiner cited to paragraph [0103] of Fitzsimons as teaching this recitation. Applicants cannot discern any portion of paragraph [0103] of Fitzsimons which teaches or suggests (1) the passage of pointers to transformation objects, (2) the transformation of objects in a path, or (3) the application of a transformation to data in a series. Further, the examiner cites to Carosso for the proposition that creating a plurality of pointers wherein each pointer uniquely points to a single row of data from among the plurality of rows of data in the buffer is well known in the art. (Official Action, page 14.) Without conceding this point, applicants submit that the cited portions of Carosso fail to cure the above-mentioned deficiency in Fitzsimons.

For at least the foregoing reasons, applicants submit that claim 11 is patentably defined over the cited art and request withdrawal of the rejection of claim 11.

Inasmuch as **claims 12-15 and 25-29** depend from independent claims 11 and 23, applicants submit that claims 12-15 and 15-29 are patentably defined over the cited art and request withdrawal of the rejection of claims 12-15 and 15-29.

Claim 14 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Fitzsimons (US 2004/0205452), in view of Carosso et al (US 4,783,760) further in view of Gerard (US 6,023,704).

Inasmuch as **claim 14** depends from independent claim 11, applicants submit that claim 14 is patentably defined over the cited art and request withdrawal of the rejection of claim 14.

CONCLUSION

In the view of the foregoing remarks, Applicants respectfully submit that the present application is in condition for allowance. Reconsideration of the application and an early Notice of Allowance are respectfully requested. In the event that the Examiner cannot allow the application for any reason, the Examiner is encouraged to contact Applicants' representative.

Date: December 5, 2008

/Michael J. Swope/
Michael J. Swope
Registration No. 38,041

Woodcock Washburn LLP
Cira Centre
2929 Arch Street, 12th Floor
Philadelphia, PA 19104-2891
Telephone: (215) 568-3100
Facsimile: (215) 568-3439